

July 25, 2016

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**Testimony to the EPA on the Draft
NPDES Permit for Pilgrim Nuclear Power Station
Plymouth, Massachusetts
NPDES Permit No. MA0003557**

After attending the hearing on the 21st of this month, I left with diminished confidence in my government's ability to serve its citizens. It is my observation that the Environmental Protection Agency (EPA), like the Nuclear Regulatory Commission, is more concerned with the interests of Corporate America than with those they are mandated to protect and the environment which they are charged to safeguard.

Pilgrim Nuclear Power Station has operated for two decades with an expired EPA permit. The purpose of the five year renewal schedule is to allow corporations to update their technology as improvements become available. The twenty year lapse offered Entergy no incentive whatsoever to upgrade even though much needed technology was available in order to reduce impacts to the environment. I question the timing of this new draft permit coming at a time when it had become apparent that Entergy was losing money and would soon be forced to shut down the plant.

I live on a fragile spit of land on the shores of Cape Cod Bay. In comparison to the oceans, it is a small body of water and is therefore easily affected by natural forces now in play.. Global warming is causing sea levels to rise and raising water temperatures around the globe including our bay. Pilgrim is an unnatural force now in play. If the EPA had been doing its job and using readily available data, Energy should have been required to abandon their once through cooling system decades ago. With this outdated system, most of the energy produced by Pilgrim is discharged into the bay as heat causing a measurable rise, approximately thirty degrees, in water temperature. If the EPA had been doing its job, Entergy would have been cited for violating the Clean Water Act for using this outdated technology.

Our bay is home to many species which have been impacted. The river herring, or alewife and bluebacks, once an important food source for the early settlers, have significantly decreased in numbers. I did not realize until the recent hearing that Entergy had a captive breeding program for flounder. There would be no need for such an undertaking if there were not a devastating impact on the native flounder. Additionally, the reactor acts as an oversized Cuisinart pureeing all marine life sucked into the cooling system.

Your callous disregard of safety and the environment is exemplified by the EPA's David Webster who described looking at "the cost and benefits and feasibility." This clearly works in favor of the Corporation and is detrimental to public health and safety and to the environment. Webster further stated that in looking "at estimated plant life, we thought the time to put these technologies in place would go beyond operation time." The fact is that the plant has already exceeded its planned lifetime. Its permit to operate should not have been renewed in 2012 with outdated technology in place. It has deteriorated and is deteriorating further as Entergy no longer has an incentive to invest in any upgrades or repairs choosing, instead, to coast along until the announced closing date in 2019.

This permit should not be issued as written. The EPA must put its mandate to ensure ENVIRONMENTAL PROTECTION ahead of its sympathies for any financial burdens incurred by the corporation which, in this case, is Energy Corporation.

Respectfully submitted by
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